

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No. 22-CV-20712-RKA

PENINSULA PETROLEUM LIMITED,

Plaintiff,

v.

CI INTERNATIONAL FUELS, LLC,

Defendant.

**MOTION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS COMPLAINT**

**COMES NOW**, Defendant, CI INTERNATIONAL FUELS, LLC (hereinafter "Defendant"), hereby files this Motion for Extension of Time to Reply to Plaintiff, Peninsula Petroleum Limited's Response in Opposition to Defendant's Motion to Dismiss Complaint and in support thereof states as follows:

1. On December 23, 2022, Defendant filed a Motion to Dismiss for Forum Non Conveniens [DE 52] in response to Plaintiff's Amended Verified Complaint.
2. On January 19, 2023, Plaintiff, Peninsula Petroleum Limited filed a Response in Opposition to Defendant's Motion to Dismiss [DE 60].
3. The deadline to reply to Plaintiff's Response in Opposition to Defendant's Motion to Dismiss is January 26, 2023.
4. Due to the undersigned counsel's extremely heavy workload, the undersigned has been unable to properly review the Response in Opposition to Defendant's Motion to Dismiss properly and prepare a reply to same by the court-imposed deadline.
5. As such, undersigned counsel respectfully requests an additional fifteen (15) days to reply to Plaintiff's Response in Opposition to Defendant's Motion to Dismiss.

6. Plaintiff will not be prejudiced by allowing undersigned counsel additional time to reply to Plaintiff's Response in Opposition to Defendant's Motion to Dismiss.
7. Undersigned counsel conferred with Plaintiff's counsel who opposes the request for an extension of time.

**WHEREFORE**, Defendant, CI INTERNATIONAL FUELS, LLC and undersigned counsel, respectfully request the entry of an order granting a fifteen (15) day enlargement of time to reply to Plaintiff's Response in Opposition to Defendant's Motion to Dismiss and granting such further relief as the Court deems just and proper.

Respectfully submitted,

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By: /s/ Lori Dilican  
Lori Dilican, Esq.  
Fla. Bar No. 100472

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed and served on all parties registered via the CM/ECF e-filing portal on this 25<sup>th</sup> day of January, 2023.

By: /s/ Lori Dilican  
Lori Dilican, Esq.  
Fla. Bar No. 1004723